Inspection Report
U.S. Environmental Protection Agency
Region 9
Toxics and Waste Management Division
Field Operations Branch

Purpose: RCRA Investigation

Facility: IT Corp., Baker Facility
896 Waterbird Way
Martinez, CA 94553

EPA ID number: CAD089680250

Report number: R(86)E096

Date of Investigation: March 3, 1986

EPA Inspectors: Barry Cofer
Field Investigator

Donn Zuroski
Environmental Scientist

Facility Representative: Micheal S. Foster
Program Manager, Environmental Affairs

Mark C. Posson, CHMM
Manager, Benecia Facility

Wendell Pells
Site Manager

Report Prepared By: Barry Cofer

Report Date: April 4, 1986

BACKGROUND

This investigation was specifically conducted to resolve and document issues of particular concern to the Waste Enforcement Section. See Attachment #2.

SURFACE IMPOUNDMENTS D-2, D-3, AND E FREEBOARD

Micheal S. Foster, Program Manager for Environmental Affairs, stated ponds D-2, D-3, and E contain sludge and rainwater.

The photographs in Attachment #1 show the freeboard levels in the impoundments. The liquid level of D-1 is shown in photo 2A. D-2 is shown in photos 3A-B and 7A. D-3 is shown in photos 1A-B, 3A, 4A-B, and 6A. E Pond is shown in photos 1A and 7B.

Surface impoundments D-2, D-3, and E contained some standing water and mounded sludge. Tractor tread marks from the working of the sludges are visible in D-3. Foster reported that the sludge was piled last summer for projected disposal at IT Panoche, but no sludge had been removed from the surface impoundments. See photographs 1A-B, 2B, 6A-B, Attachment #1.

Foster was unable to document the last movement of waste into or out of ponds D-2, D-3, or E at IT-Baker. He reported that only the waste movements to Baker through the Vine Hill-Baker pipeline are tabulated. Movements from pond to pond at Baker are not routinely reported. Foster stated the information may be extractable from the pond operator's notes. The notes were said to be kept at Vine Hill and not immediately available. Foster agreed to compile and transmit the information by 3/5/86.

Copies of the monthly reports filed with the Regional Water Quality Control Board from January 1985 through January 1986 were reviewed for freeboard levels and liquid depth documentation. See Attachment #3.

The "Depth of Pond" entry in the monthly reports list pond D-2 as empty from July through December 1985. Ponds D-3 and E depths are listed as empty or at zero feet from May through December 1985.

In the January 1986 report the "Depth of Pond" entry was retitled "Depth of Liquid in Pond". The transmittal letter in Attachment #3 states that this revision more accurately reflects what is being measured. The January 1986 liquid depth entry shows 0.6 feet for Pond D-3, and 0.5 feet for Pond E. Pond D-2 shows 9.0 feet Freeboard and 6.0 feet Depth of Liquid for a total of 15.0 feet. The February 1985 through December 1985 Depth of Pond entries for Pond D-2 total 9.6 feet each month.

The total measurement in feet (freeboard plus depth of the pond) of D-2, D-3 and E increased between the January 1985 and February 1985 entries. Foster determined that during the first week in March 1985 measurements of the depth of the water were made from a boat,

and the measurements were averaged to get the new listed pond depths. The monthly report is annotated with: "on-site observations beginning 2/85 are based on pond depth survey of 2/28/85". Foster stated the freeboard levels entered in the monthly report were obtained from a single day's measurement made during the last week of each month.

The daily logs, titled "Facilities and Equipment Daily Inspection, IT Environmental-Baker Site" from April 1985 to date were reviewed for freeboard information. Notes attached to the Daily Inspection reports referred to "Bolt=2.8'", and "0/0". Upon our questioning, Foster determined that these were reference marks used by pond operators to calculate freeboard. In 1984, the dikes reportedly were all raised by several feet to compensate for subsidence. "0/0" indicated the original center mark on the pond depth poles from when the levee was first constructed. "Bolt 2.8'" referred to a bolt on the tank by C Pond which had been surveyed from the dike. Foster said pond operators use a conversion table to convert readings from the marks and poles into calculated pond depth and freeboard levels.

Foster provided design depths for the ponds as 9.87' for D-2, 8.95' for D-3, and 8.08' for E. These numbers were quoted from the Part B application, submitted before the liquid depth resurvey. The current total depth of the surface impoundments, from dike surface to bottom lining, could not be determined.

POND LIQUIDS DISTRIBUTION SYSTEM

Foster provided a valving and piping diagram for the Baker surface impoundments. See Attachment #4.

Little of the piping interconnecting the ponds is visible. Photo 2A, Attachment #1, shows (far left) the inlet valve and pipe for D-1. Photo 7A shows the inlet pipe for D-2. Photo 7B shows the inlet valve and pipe for pond E. No existing inlet valve or pipe for D-3 was found.

Photo 5B shows (bottom right) a valve and stub of pipe. This pipe is shown in the diagram as connecting D-2 to D-3 and E. The dike the pipe crossed through has been removed.

A-1 Cell and B Pond have submersed pumps, equipped with eye hooks, that can be moved between ponds. They are dedicated to the Baker facility. Portable pumps were photographed during the IT Baker and Vine Hill inspections of February 20, 1986 (see report R(86)E081). Foster stated that the portable pumps were rented to help equalize freeboard during the heavy rains. The pumps were partially stripped down, rinsed with clean water, and returned to the rental company.

GENERAL IMPOUNDMENT OBSERVATIONS

A slurry wall, under construction in the northern dike of D-3, is shown in photo 3A. A trench was dug with a backhoe (photos 3A,

6A-B). A bentonite slurry was mixed in the area between D-3 and E (photos 5A-B). The slurry was placed in the trench and allowed to stand before trench backfilling commenced (photo 4B). The backhoe was decontaminated by rinsing with water from a tank truck (photo 6B). The rinse water (photos 6A-B) and the soils from the trench were deposited into D-3 (photos 4A-B).

Possible erosion of the inner dike surface of pond E is visible in photo 7B.

During the inspection of February 20, 1986 the northeast corner of the pond B dike was found discolored. An oily stain extended across the roadway and partway down the opposite side of the dike. See report R(86)E081. Photographs 8A-B of this report show hay bales that are set out to absorb any oil blowing from the impoundment, fresh gravel placed on the roadway, and clean dirt placed on the outside of the dike. More hay bales are stockpiled nearby.

DOCUMENTATION REVIEW AND TRANSMITTAL

The Daily Inspection Logs routinely included only inspector's initials, not full names. The date but not the time of inspection was recorded on some entries. Minor oil sheens on pond surfaces and freeboard balancing needs were the topic of most of the written entries. On one page an entry noted a leak between dikes and cited a "weekly report"; a copy of this page was requested. The weekly report referred to was identified as one prepared under NPDES discharge permit requirements. A copy of the report for the week of September 23 through September 27, 1985 was requested.

A recent copy of the closure plan, post-closure plan, and closure cost estimate was requested in advance and provided. See Attachment #5.

At the close of the inspection the requested records, information, and laboratory analyses not yet copied or provided were discussed. Duplication and transmission of the records by 3/5/86 for receipt by EPA on 3/7/86 was negotiated with Foster. IT was contacted on 3/10/86 when no documents had been received, and again on 3/12/86.

Foster returned the calls on 3/12/86, and stated in the conversation that the daily inspection log page and the weekly report under the discharge permit requested were being copied by the National Enforcement Investigations Center, and if we wished copies we could consult NEIC. The requested analytical results were still in the lab, and would not be available for another week. Foster stated that the last waste movement in or out of the ponds was discussed in a letter from IT to Harold Singer (RWQCB). The letter was sent sometime in February, and we should see Mostafa Radmand of our office who had a copy. Howard Culver was reported to have been discussing the ponds in question with Radmand. Foster did agree to mail a copy of the monthly RWQCB monitoring reports. See Record of Communication, Attachment #7.

DOCUMENTATION SUMMARY

Water Board Monthly Reports: Reviewed during inspection. The facility copy presented was too faint to be completely legible. A readable copy was promised for receipt by 3/7/86. A copy was received on 3/21/86, with many entries still not discernable. See Attachment #3.

Closure Plan: Requested in advance and received during inspection. See Attachment #5.

Baker Pond Piping Diagram: Requested in advance and received during inspection. See Attachment #4.

Daily Inspection Logs: Reviewed during inspection, copies promised by 3/7/86, not provided to date.

Weekly Inspection Report: Not available for review during inspection. One week's entry promised by 3/7/86. Not provided to date.

Dates of Last Waste Movement into or out of Cells D-1, D-2, D-3, and Pond E: Not available during inspection. Promised by 3/7/86. Letter to RWQCB referenced by Foster did not include dates or documentation requested. Not provided to date.

Oil analysis: Promised by 3/7/86, received 4/2/86. See Attachment #8.

VINE HILL

When notified in advance of our inspection, G. Douglas Clark, Regional Director for Regional Compliance, directed the inspectors to arrive at the Vine Hill facility where the inspection records were to be made available.

An excavation of oily water and soil was observed and photographed while we were waiting at the gate security area for a facility representative to arrive.

Soil had been dug by backhoe and removed, leaving standing water with an obvious sheen, stained soil, and exposed and broken piping. See photos 9A-B, 10A-B, 11A-B, Attachment #1. Workers reported that one partially-full 38 barrel tank truck had already gone to IT Benicia (Pinoche). The inspectors intervened to halt a bulldozer that was filling the hole with stockpiled gravel. Mr. Wendell Pells stated that the backfill was to create a work area for the installation of a sump to collect the standing water.

The sheen was assumed by Pells to be fuel oil. A boiler was being removed from inside the building. An oil sample had been collected from the excavation with analysis results expected by the end of the day. See Attachment #6, received 4/4/86. The square hole in the siding at soil level, visible in photo 9A of Attachment #1, was a sewer drain. Piping for the lab sink drain was located in the

hole above the sewer drain.

The area being excavated was said to have softened with each heavy rain, preventing cars from using the area as parking. Reportedly a culvert, used to drain the area to the closest IT pond, has been blocked.

The facility reported that the boiler unit had been in place for roughly thirty years. Removed brick bore the imprint of the long-defunct Carnegie works.

An exterior tank that bore the hazard label 1993 was stripped of insulation (Attachment #1, photo 12A) and five drums of insulation and pipe wrap were located next to the facility fence (photo 13A). Pells reported that the insulating material had been sampled and found free of asbestos. This was confirmed later in the inspection by Mark Freiberg, Health and Safety Coordinator.

LIST OF ATTACHMENTS

1. Photographs

2. EPA Memorandum of February 24, 1986

3. Transmittal letter dated March 17, 1986
   California Regional Water Quality Control Board Self-Monitoring Program reports for January 1985 through January 1986.

4. IT Baker Valving and Piping Diagrams with Baker Site Evaporation Ponds Map

5. Closure Plan/Post-Closure Plan
   Summary of Revised Closure and Post-Closure Costs dated April 11, 1985

6. Transmittal letter dated April 1, 1986
   Certificate of Analysis for Boiler Sump sample

7. Record of Communication of 3/12/86

R(86)E046
ATTACHMENT #1
PAGE 1

DATE: 3/3/86 NAME: COFFER 1A
DESCRIPTION: PAN OF POND E through POND D-3, LOOKING north. FOLD-OUT

DATE: 3/3/86 NAME: COFFER 1B
DESCRIPTION: D-3 CELL

DATE: 3/3/86 NAME: COFFER 2A
DESCRIPTION: D-1 CELL showing sludge piles IN EAST AND South CORNERS

DATE: 3/3/86 NAME: COFFER. 2B
DESCRIPTION: sludge pile IN EAST CORNER OF D-3, showing TRACTOR TREADS IN POND bottom

R(86)E096
#1, PAGE 2

DATE: 3/3/86 NAME: COFFER 3A
DESCRIPTION: D-3 CELL ON LEFT
TO D-2 CELL ON RIGHT

DATE: 3/3/86 NAME: COFFER 3B
DESCRIPTION: D-2 CELL

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#1, PAGE 3

R(80)EU96
#1, PAGE 4

DATE: 3/3/86 NAME: COFER 4A
DESCRIPTION: SLURRY WALL TRENCH CONSTRUCTION ON NORTH BERM OF D-3 CELL

DATE: 3/3/86 NAME: COFER 4B
DESCRIPTION: BENTONITE SLURRY IN TRENCH.

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#1, PAGE 5

DATE: 3/3/86 NAME: COFER. 5A
DESCRIPTION: SLURRY MIXING AREA - NORTH TIP OF E-POND AND WEST TIP OF D-3 CELL WALLS

DATE: 3/3/86 NAME: COFER 5B
DESCRIPTION: AREA ABOVE FROM SOUTH WALL OF D-2 CELL

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#1, PAGE 6

DATE: 3/3/86 NAME: COFER 6A
DESCRIPTION: BACKHOE BUCKET IN 6B
D-3 CELL BEING CLEANED PRIOR TO
REPAIR

R(86)E096
#1, PAGE 7

DATE: 3/3/86 NAME: COFER 7A
DESCRIPTION: D-2 CELL SHOWING SHEEN IN SOUTHWEST CORNER AND FREEBOARD AMOUNT

DATE: 3/3/86 NAME: COFER 7B
DESCRIPTION: POND E IN NORTH CORNER SHOWING FREEBOARD AND POSSIBLE EROSION.

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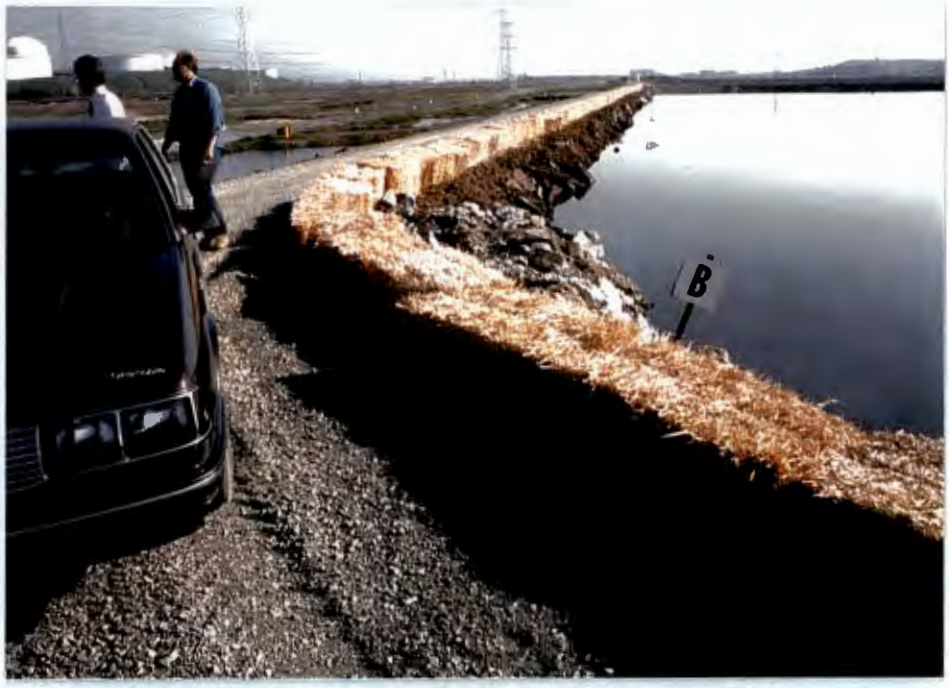
#1, PAGE 8



DATE: 3/3/86 NAME: COFER 8A
DESCRIPTION: NORTHEAST CORNER OF POND B SHOWING NEW GRAVEL AND HAY BALES SET OUT TO CONTROL FOAM BLOWING

DATE: 3/3/86 NAME: COFER 8B
DESCRIPTION: AS ABOVE, SHOWING FRESH GRAVEL AND CLEAN SOIL

R(86)E096
#1, PAGE 9

DATE: 3/3/86 NAME: COFER 9A
DESCRIPTION: VIEW OF EXCAVATION
SHOWING SHEEN ON WATER, OUTLET
FROM WALL, AND STAINED STRATA
IN SOIL

DATE: 3/3/86 NAME: COFER 9B
DESCRIPTION: CONTINUATION OF 9A
SHOWING EXTENT OF STANDING WATER
AND REMOVED PIPING

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#1, PAGE 10

DATE: 3/3/86 NAME: COFER 10A
DESCRIPTION: VIEW OF EXCAVATION SHOWING DISCOLORED SOILS AND REMOVED PIPING.

DATE: 3/3/86 NAME: COFER 10B
DESCRIPTION: EARTHMOVING EQUIPMENT, EXPOSED PIPING, AND THE OUTLYING AREA OF STANDING WATER

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#1, PAGE 11

DATE: 3/3/86 NAME: COFER 11A
DESCRIPTION: "SUMP" OF WATER WITH SHEEN LOCATED NEAR THE RED AND WHITE POLE SHOWN IN 11B AND OTHER PHOTOS

DATE: 3/3/86 NAME: COFER 11B
DESCRIPTION: PICTURE OF AREA TAKEN FROM THE REVERSE SIDE OF PREVIOUS PHOTOS

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#1, PAGE 12

DATE: 3/3/86 NAME: COFER 12A
DESCRIPTION: TANK WITH REMOVED INSULATION

DATE: 3/3/86 NAME: COFER 12B
DESCRIPTION: PUMP AND SUMP.

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#1, PAGE 13

DATE: 3/3/86 NAME: COFFER 13A
DESCRIPTION: COLLECTED INSULATION FROM PIPES AND BOILER STORED BY FACILITY FENCE

R(86)E096
ATTACHMENT #2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

February 24, 1986

MEMORANDUM

SUBJECT: Inspection at IT-Baker

FROM: Paul Blais
Chief, Waste Enforcement Section (T-2-4)

TO: Daniel Horgan
Team Leader, Field Investigations Section (T-3-2)

This is to identify the issues of particular concern about the IT-Baker facility which should be inspected by Barry Cofer when he visits the site on February 27 and 28.

Surface impoundments D-2, D-3, and E may be empty. Please document last receipt of wastes to these impoundments. Obtain copies of the monthly reports filed with the Regional Quality Control Board which documents freeboard levels in all surface impoundments (from April 1985 to the most recent report filed. Take photographs of each of the impoundments which show the level of liquids in ponds D-2, D-3, and E. Take photographs of the liquid level in pond D-1 for comparison. Determine how the ponds are connected and take pictures any permanent pipes, pumps, or drains which may distribute liquid among these ponds. Examine the operating records to determine the following:

1. If any mobile pumps were used to transfer wastes among the ponds since April 1985.

2. How much waste was removed from ponds D-2, D-3, and E. When that waste was removed. The location where the waste was moved.

3. Obtain copies of documents relating to the transfer of wastes in and out of ponds D-2, D-3, and E.

Examine inspection scheduldes from April 1985 to date to determine entries relating to waste movement, freeboard, and other problems. Obtain copies of records which show problems and the date the problem was resolved. Obtain a copy of the most recent closure plan.

If you have any questions concerning this request, please contact Robert Boesch.

cc: Barry Cofer

UNITED STATES GOVERNMENT

2-Way Memo

INSTRUCTIONS

Use routing symbols whenever possible.

SENDER (*Originator of message*):
Use brief, informal language.
Conserve space.
Forward original and one copy.

RECEIVER (*Replier to message*):
Reply below the message, keep one copy, return one copy.

Subject: RCRA Investigation
Report No. R(86)E096

From : Phil Bobel, Chief
RCRA Programs Branch

DATE OF MESSAGE	ROUTING SYMBOL
4/8/86	T-2

SIGNATURE OF ORIGINATOR: Barry Cofer

TITLE OF ORIGINATOR: Field Investigator

FOLD FOLD

MESSAGE

Enclosed is an inspection report for IT-Baker conducted by request of enforcement to clarify specific issues. The memo detailing these concerns was placed in the report at the direction of T-2-4. Boesch will cite violations.

REPLY

DATE OF REPLY	ROUTING SYMBOL

SIGNATURE OF REPLIER: KQS 4/25/86

TITLE OF REPLIER:

To :

Barry Cofer, Field Inspections Section (T-3-2)

Thru: Kathleen Shimmin, Chief, Field Operations Branch (T-3)

2. RETURNED TO ORIGINATOR

OPTIONAL FORM 27 (Rev. 7-81)
GSA FPMR (41 CFR) 101-11.6
NSN 7540-00-082-2447

5027-107

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Subject: RCRA Investigation
Report No. R(86)E081

To : Phil Bobel, Chief
RCRA Programs Branch

DATE OF MESSAGE	ROUTING SYMBOL
3/29/86	T-2

SIGNATURE OF ORIGINATOR: Barry Cofer B Cofer

TITLE OF ORIGINATOR: Field Investigator

FOLD FOLD

INITIAL MESSAGE

Enclosed is an inspection report for IT-Baker conducted by request to determine if facility is meeting freeboard requirements. Dark stains attributed by facility to "oil foam blowing across" were found on the berm, roadway, and part-way down the other side of Pond B. On the 3/03/86 Baker site inspection, this area had new rip-rap on the impoundment face, new gravel across the roadway, and hay bales set along the north-east perimeter of Pond B.

Potential Violation: 40 CFR 265.222 (a)

REPLY MESSAGE

DATE OF REPLY	ROUTING SYMBOL

SIGNATURE OF REPLIER

TITLE OF REPLIER

From : Barry Cofer, Field Inspections Section (T-3-2)

Thru: Kathleen Shimmin, Chief, Field Operations Branch (T-3) KS 4/3/86

3rd TO BE RETAINED BY ADDRESSEE (*Receiver*)

2 8 APR 1986

In Reply Refer to: T-3-2
R(86)E096

Mr. David L. Bauer
Vice President, Environmental Affairs
IT Corporation
P.O. Box 2995
23456 Hawthorne Blvd.
Torrance, CA 90509

Dear Mr. Bauer:

On March 3, 1986 a hazardous waste investigation was conducted at your Baker facility. During the course of this investigation, information was gathered in accordance with Section 3007 of the Resource Conservation and Recovery Act of 1976. A copy of our investigation report is enclosed for your information.

EPA routinely provides copies of investigation reports to State agencies. Such releases will be handled according to the basic rules governing business confidentiality claims contained in the Code of Federal Regulations (40 CFR Part 2). Any claim of confidentiality should be made within fifteen (15) working days from the receipt of this letter. EPA will construe a failure to furnish timely comments as a waiver of the confidentiality claim.

If you have questions related directly to technical aspects of this report, please contact Barry Cofer at (415) 974-7844. Questions related to your interim status should be directed to the Berkeley office of the Department of Health Services at (415) 540-2043.

Sincerely yours,

ORIGINAL SIGNED BY:

Kathleen G. Shimmin
Chief, Field Operations Branch

Enclosures

cc: Caroline Cabias, DOHS-HQ (w/encl.)
Paul Smith, DOHS-HQ (w/o encl.)
Dwight Hoenig DOHS-Berkeley (w/encl.)
Roger Johnson, SWRCB (w/o encl.)
Harold Singer, RWQCB (w/encl.)

✓bc: Wilson